UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, CA 94105

7003 3110 0006 1998 5852

SEP 23 2015

Mr. Ford Fuchigami
Director
Department of Transportation
869 Punchbowl Street,
Honolulu, Hawaii 96813

Re: EPA Conditional Approval for Residual PCBs Remaining from a PCB Transformer Release, Kapalama Military Reservation, Building 905

Dear Mr. Fuchigami:

Thank you for your submission of the *Risk-Based Assessment Memorandum for the Kapalama Military Reservation, Honolulu, HI, Project No. C493*, dated August 24, 2015 (Risk-Based Assessment Memo), prepared by Integral Consulting, Inc. (Integral Consulting) for Advanced Compliance Solutions, Inc. (ACSI), on behalf of the Department of Transportation (DOT). The Risk-Based Assessment Memo provides a risk evaluation based on the confirmation samples collected following the removal of polychlorinated biphenyl (PCB)-impacted media at Building 905 at the Kapalama Military Reservation in Honolulu, Hawaii (Site). PCBs at the Site were the result of a large PCB transformer release caused by vandalism. The U.S. Environmental Protection Agency Region 9 (EPA) is issuing this conditional approval letter for PCBs remaining at the Site, under the Toxic Substances Control Act (TSCA) pursuant to 40 C.F.R. § 761.61(c), and in response to results of the Risk-Based Assessment Memo.

The Risk-Based Assessment Memo provides a summary of confirmation sampling results in the remaining soil, concrete wall, and asphalt pavement at the Site following removal activities. Results indicate that residual PCBs remain at the Site at a concentration of up to 3.4 milligram per kilogram (mg/kg). This result as well as other results from the sidewall and ledge of the soil excavation, concrete wall, and asphalt paving were used to determine the potential impacts to future commercial/industrial workers from exposure to residual PCBs remaining at the site by estimating the exposure point concentrations (EPC). The EPC, based on confirmation sampling results, is approximately 1.6 mg/kg. The EPC was compared to risk-based concentrations (RBCs) based on relevant exposure pathways and assumptions. Potential risk-based exposure to marine environment from subsurface PCB releases, including potential fish consumption was also evaluated. This is documented in an email from Ms. Bridgette DeShields, a risk assessor at Integral Consulting, to EPA dated August 28, 2015. According to Ms. DeShields, impacts to the marine environment are unlikely, as the area of the PCB spill was localized and approximately 760 feet from the shoreline, and there are no storm drains in the immediate vicinity of the PCB spill. Ms. DeShields further indicated that the nearest water body, an adjacent lagoon, is offshore of an industrial area such that recreational fishing and fish consumption from that area specifically, although possible is not likely.

This conditional approval applies only to residual PCB concentrations remaining at the Site, and does not include any other portion of the Kapalama Military Reservation. Upon EPA request, ACSI provided

records of other transformers at the Kapalama Military Reservation in an email dated June 30, 2015. The records indicate that 32 transformers at the Kapalama Military Reservation were tested for PCBs using EPA Method 8082 in January 2015. The analytical results indicated that all transformers contained oil with PCBs (Aroclor 1016 and Aroclor 1260) at concentrations less than 10 parts per million (ppm). EPA is not aware of any release associated with the 32 transformers tested. Based on the source concentrations and lack of evidence of any type of release from these transformers, EPA does not require further action for these transformers at this time.

Based on review of the risk-based assessment, EPA concludes that no further cleanup of PCBs at the Site is warranted. However, EPA may seek additional investigation and cleanup of PCBs, if:
(1) a finding is made after the date of this letter indicating that PCBs remain at the Site at concentrations above acceptable levels of total PCBs based on the risk evaluation provided in the Risk-Based Assessment Memo, and/or
(2) the potential for exposure described in the Risk-Based Assessment Memo changes as a result of a change in land use or change in operations conducted at the Site.

As an added measure, DOT shall inspect the repaved area where the former PCB transformer was located on an annual basis, and repair cracks as needed. Annual inspection reports may be maintained at the Site. EPA does not require submission of these inspection reports; however, DOT shall make inspection reports available if requested by EPA.

EPA will be coordinating with Hawaii Department of Health (HDOH) to incorporate this conditional approval into the Environmental Hazard Management Plan (EHMP) for the Kapalama Military Reservation.

This letter does not relieve the property owner or DOT from complying with all applicable federal, state, and local regulations and permits, nor does it exempt or waive any requirement to obtain additional cleanup orders, approvals or permits pursuant to other regulatory programs, where warranted. DOT is also under a continuing obligation to comply with all requirements of TSCA regardless of whether or not such requirements are contained within this letter. This letter is subject to change if use of the land changes or new information shows that PCB concentrations at the Site present an unreasonable risk of injury to human health or the environment. At such time, consistent with its TSCA authorities, EPA may require additional PCB site characterization and/or cleanup.

If you have any questions concerning this approval, please contact Cynthia Ruelas of my staff at (415) 972-3329. Thank you for your cooperation.

Sincerely,

for Jeff Scott
Director, Land Division

Electronic cc: Steve Mow, HDOH
Melchor A. Travens, DOT
Dennis Poma, ACSI
Jingbo Chang, Pacific Commercial Services, LLC
Bridgette DeShields, Integral Consulting